

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

ALEJANDRO MOSQUEDA PAZ,  
a/k/a "ALMIGHTY,"

Plaintiff,

v.

Civil Action No.: 25-cv-22652-KMW

PRIMO BOYZ RECORDS LLC  
a/k/a PRIMO BOYZ RE L.L.C,  
PRIMO BOYZ MUSIC PUBLISHING  
L.L.C., and JOSÉ POLANCO

Defendants.

**DECLARATION OF JOSE POLANCO IN SUPPORT OF MOTION TO QUASH  
SERVICE OF PROCESS AND VACATE CLERK'S DEFAULT**

I, Jose Polanco, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1) I am over the age of eighteen and competent to make this declaration. I have personal knowledge of the facts stated herein, and if called upon to testify, I could and would testify competently thereto.

2) I am a defendant in the above-captioned action and submit this declaration in support of my Motion to Quash Service of Process and Vacate Clerk's Default.

3) I am the founder and managing member of Primo Boyz Records LLC and Primo Boyz Music Publishing L.L.C., both of which are also named as defendants in this action.

4) On June 25, 2025, at approximately 8:51PM, I was alerted through my Ring doorbell application on my mobile phone that someone was at the front door of my home at 2242 Quail Street, Vineland, New Jersey.

5) Through the Ring camera live feed, I observed an individual ring the doorbell. No one was home at the time, and no one answered the door.

6) While watching the Ring camera feed, I observed this individual place some papers on top of automobile tires that were positioned in front of the house, then return to a vehicle parked on the street.

7) I immediately began driving back to the property from my location.

8) When I arrived at the property, the individual was still present, sitting in his vehicle on the street. I pulled my car up alongside his vehicle. We both remained in our respective vehicles.

9) With our car windows rolled down, the individual told me that he had "dropped off some papers in front of the house." He then immediately drove away. The entire interaction lasted less than ten (10) seconds.

10) At no point during this encounter did I exit my vehicle, physically touch any documents, handle any papers, or drop any documents. The individual never attempted to hand me any papers.

11) After the individual drove away, I exited my vehicle and retrieved the papers from where they had been left on the tires.

12) My Ring doorbell camera system recorded the events I have described above. The footage shows:

- a. The individual arriving and ringing the doorbell;
- b. No one answering the door;
- c. The individual placing papers on the tires and returning to his vehicle;
- d. My arrival in my vehicle;

e. Our brief conversation while both seated in our respective vehicles;

f. The individual departing.

13) I have preserved all video footage from June 25, 2025, which is attached hereto as Exhibit "1."

ACTIONS AFTER DISCOVERING THE PAPERS

14) After retrieving the papers from the tires, I discovered they appeared to be legal documents related to a lawsuit.

15) Since discovering the papers on June 25, 2025, I have taken prompt action to address this matter.

16) That same day, I contacted my general counsel, Ivan Parron, Esq.

17) Thereafter, on July 9, 2025, I authorized Mr. Parron to waive service of process on my behalf.


18) I also authorized Mr. Parron to engage litigation counsel in Miami to represent the Defendants in this proceeding.

19) Upon retaining counsel, I have cooperated fully in preparing this declaration, which is being filed at the earliest opportunity.

20) I have not attempted to evade service or delay these proceedings. I am prepared to defend against the claims in this lawsuit.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on July 30, 2025 in New Jersey.

  
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Jose Polanco (Jul 30, 2025 14:03:11 EDT)  
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JOSE POLANCO